

Joshua G. Harris

In Care of: 725 Hertel Ave #223

Buffalo, New York 14207

August 8, 2024

Subject: Letter of request and list of Deponents

Notice of Change of Address of Correspondence

To The Honorable Judge Jeremiah J. McCarthy:

I'm writing this letter to fulfill the request (during a tele-conference call, back in December of 2023) from the Honorable Judge Jeremiah J. McCarthy, stating that he would like me to write a letter to him addressing my request and leave of a list of the Defendants of which I would like to depose. The list of the Defendants that I'm requesting leave to depose are as follows:

BUFFALO DEFENDANTS

1. TODD MCALISTOR,
2. ELNUR KARADZHAYEV,
3. JEFFERY JAKOWSKI,
4. MAURICE FOSTER,
5. MARY MAY,
6. KENNETH ANAYA,
7. SCOTT CULVER,
8. ANGEL ANGRIACCIO,
9. TERRELL BOLDEN,
10. ANTHONY AVOLIO,
11. PHILIP HINTERBERGER,

G4S DEFENDANTS

- 12. S.KIRSCH,
- 13. MS. RAMADAN,

ERIE COUNTY DEFENANTS

- 14. JASON WAHL,
- 15. R. ROETZER,
- 16. MR. ALABANESE,
- 17. MADONNA BISHOP,

NEW YORK STATE DEFENDANTS

- 18. JOHN MCEVOY,
- 19. ROBERT PERRY,
- 20. DAN DENEKA,

Due to the length of this lawsuit, the number of incidents, and Defendants in this Complaint, the requested list is over the limit of 10. Pursuant to F.C.R.P Rule 30, I am requesting leave to go over that limit. Please note that I do intend on reaching out to the Defendants to work out scheduling and arrangements for said depositions. If no arrangements can be made and/or if there are any issues that may arise regarding the scheduling of said depositions, I'm requesting that the depositions can be done remotely via zoom or any other similar platform, or whatever this court deem just and proper.

ALSO, TO ALL PARTIES PLEASE TAKE NOTICE:

During these proceedings, **please send all Corresponding documents in care of 725 Hertel Ave #223 Buffalo New York 14207.** Please take this as notice of change of

Correspondence. Also please note that I am still a party that is participating in the electronic filing system program. I'm just informing all parties of the new address, to send any corresponding documents (if any) as needed via mail, thank you.

Sincerely,

/s/ Joshua G. Harris

Joshua G. Harris

CC to

Denetra D. Roberts denetra.roberts@ag.ny.gov

David M. Lee dlee@city-buffalo.com,

Joshua Paul Rubin jrubin@gerberciano.com,

Morgann Obrochta morgann.obrochta@erie.gov,